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Attorney for Defendant, JACOB GONZALEZ

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DISTRICT

UNITED STATES OF AMERICA

V.

JACOB GONZALEZ, *et al*

(JACOB GONZALEZ-1)

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***EX PARTE APPLICATION TO
ALLOW DEFENDANT TO
REMAIN OUT PAST CURFEW;
[PROPOSED ORDER]***

[HON. GEORGE H. WU]

Defendant, JACOB GONZALEZ, through counsel of record, Vitaly B. Sigal,
applies to this Court for an Order allowing him to be outside his home after curfew
between February 6, 2025, and February 9, 2025, so that he may travel to Lake

1 Arrowhead, California with his girlfriend's family. The application is based on the
2 declaration of defendant's counsel, Vitaly Sigal.
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6 Dated: January 17, 2025

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Vitaly B. Sigal

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VITALY B. SIGAL, ESQ.
ATTORNEY FOR DEFENDANT

DECLARATION OF VITALY B. SIGAL

I, Vitaly B. Sigal, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am admitted to practice before the United States District Court for the Central District of California. My California State Bar number is 198623. I am the appointed attorney of record for Defendant JACOB W. GONZALEZ.

2. I submit this declaration in support of Defendant's Unopposed *Ex Parte* Application to Allow Defendant to Remain Out Past Curfew.

3. The court modified the conditions of the defendant's bond on January 16, 2024, and ordered that the defendant comply with a curfew condition, as directed by United States Pretrial Services (PSA). [ECF 85]. A modified bond reflecting the curfew condition was filed on the docket on February 5, 2024. [ECF 87].

4. The defendant's sentencing is currently scheduled for February 13, 2025. It is anticipated that he will be sentenced to at least ten-years in custody.

5. The defendant's girlfriend's family have rented a cabin in Lake Arrowhead, California for the dates of February 6, 2025, to February 9, 2025. He would like to travel along with them.

6. Although Lake Arrowhead is still within the Central District of California, the multi-night stay would require him to stay outside of his home past his curfew hours. He is asking that the court approve this travel.

1 7. On January 16, 2025, I provided a rough draft copy of this application to
2 the defendant's PSA officer Keisbel Jones. Officer Jones responded as follows: "Due
3 to Mr. Gonzalez recent violations to include multiple curfew violations and admission
4 of continuous marijuana use since Christmas until approximately a week ago, Pretrial
5 Services does not agree with the proposed request."
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8 8. On January 16, 2025, I conferred by email with Alexandra Sloan
9 Kelly from the United States Attorney's Office regarding this application. Ms. Kelly
10 informed me that she concurs with the position of Officer Jones and opposes this
11 request.
12

13 9. I also presented the modified rough draft of the instant application to both
14 Officer Jones and Ms. Kelly after receiving their positions.
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16 10. The defendant acknowledges the pretrial officer's, AUSA's, and court's
17 concerns regarding his prior violations and understands the importance of adhering to
18 all pretrial conditions. He respectfully submits that this request is made in good faith
19 and is motivated by a genuine desire to spend quality time with his loved ones during
20 this critical period. The defendant is willing to comply with any additional monitoring
21 or restrictions deemed necessary by the court to ensure that his temporary absence does
22 not pose a risk.
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26 11. Given the significance of family support in rehabilitation and the positive
27 impact it can have on individuals facing legal challenges, the defendant humbly
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1 requests that the court consider this request with compassion and understanding. A
2 brief period away with his loved ones may provide the emotional support and stability
3 needed to reinforce his commitment to compliance and personal growth.
4

5 12. The defendant respectfully asks the court to grant this travel request,
6 allowing him to attend the family trip to Lake Arrowhead. He assures the court of his
7 willingness to abide by any conditions imposed and to maintain regular contact with
8 his pretrial officer throughout the duration of his stay
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12 **I declare under penalty of perjury that the foregoing is true and correct.**
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15 Dated: January 17, 2025

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19 **VITALY B. SIGAL, ESQ.**
20 **ATTORNEY FOR DEFENDANT**
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